

DAVIS, ERMIS & ROBERTS, P.C., d/b/a
Law Offices of Ronald W. Roberts
726 Dalworth, Suite 1001
Grand Prairie, Texas 75050
(972) 263-5922 Telephone
(972) 504-9347 Facsimile
Attorneys for Debtor(s)

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:	§	CASE NO. 08-40814-RFN-13
	§	
MARK AND WANDA DOWNS	§	
	§	
	§	
DEBTOR(S)	§	CHAPTER 13

MOTION FOR CONVERSION TO CHAPTER 7

TO THE HONORABLE RUSSELL F. NELMS, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, MARK AND WANDA DOWNS, Debtor in the above styled and numbered cause, and files this Motion for Conversion to Chapter 7, and would respectfully show the Court as follows:

I.

The Debtor filed a voluntary petition seeking protection under Chapter 13 of Title 11 of the United States Bankruptcy Code on February 25, 2008.

II.

The Debtor is eligible to be a Debtor under Chapter 7 of Title 11, and desires to convert this case to a cause under that Chapter.

WHEREFORE, PREMISES CONSIDERED, Debtor prays the Court to grant the Debtor's Motion to Convert to Chapter 7 Bankruptcy and for such other and further relief the Court may deem the Debtor justly entitled.

Respectfully submitted,

/s/ Craig D. Davis
RONALD W. ROBERTS
State Bar No. 17018600
CRAIG D. DAVIS
State Bar No. 00793588
JEFFREY W. ERMIS
State Bar No. 24032159
726 Dalworth, Suite 1001
Grand Prairie, Texas 75050
(972) 263-5922 Telephone
(972) 504-9347 Facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was this
the 27 day of March, 2008, served upon all parties-in-interest via ECF.

/s/ Craig D. Davis
RONALD W. ROBERTS
CRAIG D. DAVIS
JEFFREY W. ERMIS